

EXHIBIT G

1 UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
2 CAMDEN VICINAGE
MDL No. 2875

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IN RE:

4 VALSARTAN, LOSARTAN and IRBESARTAN
5 PRODUCTS
LIABILITY LITIGATION

6 -----x

7 August 13, 2021
9:12 a.m.

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10 VIDEOTAPED DEPOSITION of STEPHEN
11 LAGANA, MD, held at the offices of
12 Greenberg Traurig LLP, located at 445
13 Hamilton Avenue, 9th Floor, White Plains,
14 New York 10601, before Anthony Giarro, a
15 Registered Professional Reporter, a
16 Certified Realtime Reporter and a Notary
17 Public of the State of New York.
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1 A It's the DNA damage that
2 makes it carcinogenic.

3 Q Well, it still has to be
4 metabolized, doesn't it?

5 A Yes. And then it causes DNA
6 damage.

7 Q On the universal carcinogen,
8 are you asking me to re-ask the question?

9 A Yes.

10 Q Is there any carcinogen that
11 equally can cause all types of cancer?

12 A That's a concept I haven't
13 considered before. So there's a concept
14 in medicine called the multi-specificity,
15 which I think would apply to this
16 discussion, whereas if we say something
17 is specific, that seems to exclude other
18 avenues.

19 But take, for example, like
20 cigarette smoking, it is a multi-specific
21 carcinogenic. It can cause lung cancer.
22 Obviously, it can cause head and neck
23 cancers. It can cause bladder cancer.
24 So it's multi-specific. And there are a
25 lot of multi-specific carcinogens,

1 6:48 Eastern Time. This concludes
2 the testimony of Dr. Stephen Lagana.

3 (Time noted: 6:48 p.m.)
4

5 _____
6 DR. STEPHEN LAGANA
7

8 Subscribed and sworn to
9 before me on this _____day
10 of _____, 2021.
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12 _____
13 NOTARY PUBLIC
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